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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

HILARIO RODRIGUEZ,)	Case No. 1:21-cv-00249-JLT-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
)	TIME
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from March 11, 2022 to April 11, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff's Counsel respectfully states that the requested extension is necessary as she continues to care for her ill father in Houston, Texas with limited access to the

1 computer. Plaintiff's Counsel has included a declaration in support of the motion.
2 Defendant does not oppose the requested extension. Counsel apologizes to the
3 Defendant and Court for any inconvenience this may cause.

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5 Respectfully submitted,

6 Dated: March 11, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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8 By: /s/ Dolly M. Trompeter
9 DOLLY M. TROMPETER
10 Attorneys for Plaintiff

11
12 Dated: March 11, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

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17 By: */s/Bacilio Mendez II
18 BACILIO MENDEZ II
19 Special Assistant United States Attorney
20 Attorneys for Defendant
(*As authorized by email on March 11, 2022)

ORDER

Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's request for a thirty-day (30) extension of time to file an Opening Brief is GRANTED. Plaintiff shall file an Opening Brief on or before April 11, 2022. All other deadlines in the Court's Scheduling Order are extended accordingly.

IT IS SO ORDERED.

Dated: March 15, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE